



UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION IX
75 Hawthorne Street
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STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

SEP 14 2015

Rear Admiral John V. Fuller
Commander,
Navy Region Hawaii
850 Ticonderoga Street, Suite 110
JBPHH, Hawaii 96860-5101

Dr. Rence L. Roman
Defense Logistics Agency
Andrew T. McNamara Building
8725 John J. Kingman Road
Fort Belvoir, Virginia 22060-6221

Dear Admiral Fuller and Dr. Roman,

On May 27, 2015, the Navy and Defense Logistics Agency ("DLA") signed an Administrative Order on Consent for the Red Hill Bulk Fuel Storage Facility on Oahu, Hawaii ("AOC") after a year of negotiations with the Hawaii Department of Health ("DOH") and the U.S. Environmental Protection Agency ("EPA") ("Regulatory Agencies"). Subsequently, a public comment period was held to inform a pending decision by the Regulatory Agencies on whether to sign the agreement as is, reopen negotiations to modify the AOC, or take other steps.

We received over 140 public comments, including extensive comments from the Honolulu Board of Water Supply. Many of the comments were critical of the AOC and included recommendations for additional steps the Navy and DLA should take to address past fuel leaks from the facility and ensure the prevention of future leaks.

While we believe the existing AOC addresses many of the concerns raised, we have determined there is room for additional detail in several areas. Our negotiation team discussed the best way to address the public comments, and agreed to make several changes to the AOC, Attachment A, Statement of Work (SOW). The attached revised SOW adds the following information:

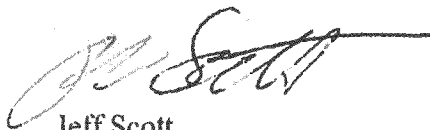
1. Steps to be taken to involve subject matter experts such as the Hawaii Board of Water Supply and Hawaii Department of Land and Natural Resources.
2. A commitment to public meetings at least annually.

3. A commitment to comply with new federal Underground Storage Tank regulations as soon as possible at the Facility.
4. Increased specificity regarding the scope of Tank Inspection Repair and Maintenance (TIRM) procedures.
5. A commitment to take actions throughout the Facility as soon as reasonably practicable to reduce risk of release independent of tank upgrades.
6. A commitment to install BAPT as soon as reasonably practicable.
7. A commitment to install monitoring wells as soon as possible to address validated data gaps.
8. Consideration of alternative fuel storage options.


Please sign the attached revised AOC as soon as possible and return the document to EPA and DOH for our signatures.

Thank you for your continued cooperation in working with EPA and DOH to address the issues presented by the tanks at Red Hill.

Sincerely,



Jeff Scott,
Director, Land Division



Dr. Keith Kawaoka
Deputy Director, DOH

Enclosure